

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

JEFFERY R. WERNER,	:	CIVIL ACTION NO.: 20-1176-LPS
	:	
<i>Plaintiff,</i>	:	
v.	:	
	:	
HIVE MEDIA GROUP, LLC, and	:	JURY TRIAL DEMANDED
KIPZO, LLC,	:	
	:	
<i>Defendants.</i>	:	

**DECLARATION OF BRUCE BELLINGHAM IN OPPOSITION TO  
DEFENDANTS' MOTION TO TRANSFER VENUE**

BRUCE BELLINGHAM hereby declares the following to be true under penalties of perjury:

1. I am Senior Litigation Counsel with the law firm of Spector Gadon Rosen Vinci, P.C.
2. I am over the age of 18, and the following testimony is based on my own personal knowledge.
3. I represent the Plaintiff, Jeffery R. Werner, in this action for copyright infringement.
4. I have represented Mr. Werner as legal counsel since 2014 in matters both personal and business-related.
5. Mr. Werner's infringement claims are set forth in a chart attached hereto which is attached to the Complaint as Exhibit "28." See Exhibit "A."
6. Kipzo, LLC was named as a defendant because it is listed in the Copyright Office's DMCA Register of Designated Agents as the service provider (i.e., the owner or operator) for the website Trendchaser.com, while Hive Media Group, LLC ("Hive") is listed as

the designated agent only. *See* <https://dmca.copyright.gov/osp/publish/history.html?search=Kipzo&id=1dbe60138b4ba7711db6d4f70c180a6d>. For all the other websites at issue in this action, Hive is listed as both service provider and designated agent.

7. In discussion on November 16, 2020 defense counsel stated that Kipzo, LLC should not be a defendant because it was a subsidiary of Hive, the owner of all the sites. I responded that Werner would agree to dismiss Kipzo, LLC, if Hive stipulated that it, not Kipzo, LLC, owned Trendchaser.com.

8. On December 1, 2020, I followed up with an email message to Defendants' counsel, Mr. Williams, stating: "By the way, if you will confirm that Hive Media, not Kipzo, LLC, owns Trend-Chaser.com I will dismiss Kipzo."

9. Defense counsel has not responded to that message.

10. The Federal Court Management Statistics showing the median time interval from filing to disposition in civil cases in the twelve months ending June 30, 2020, as reported at <https://www.uscourts.gov/statistics/table/c-5/statistical-tables-federal-judiciary/2020/06/30>, are in a table attached hereto. *See* Exhibit "B."

/s/ Bruce Bellingham  
Bruce Bellingham

December 21, 2020